

DOUGLAS COHEN (SBN 1214)  
**WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP**  
3773 Howard Hughes Parkway, Suite 590 South  
Las Vegas, Nevada 89169  
Telephone: (702) 341-5200  
Facsimile: (702) 341-5300  
dcohen@wrslawyers.com

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JEREMY ANDERSON as guardian of the  
person and estate of WILLIAM ANDERSON,  
JEREMY ANDERSON (individually and as  
the father of William Anderson) and  
JULIANA ANDERSON (individually and as  
the mother of William Anderson)

Plaintiffs,

vs.

CLARK COUNTY SCHOOL DISTRICT

Defendant.

Case No. 2:24-cv-01514-CDS-EJY

**STIPULATION AND [PROPOSED]  
ORDER FOR LEAVE TO FILE AN  
AMENDED COMPLAINT AND TO  
STRIKE LIMITED DEPOSITION  
TESTIMONY**

The parties, Plaintiffs Jeremy Anderson as guardian of the person and estate of William Anderson; Jeremy Anderson, individually and as the father of William Anderson; and Juliana Anderson, individually and as the mother of William Anderson (collectively “Plaintiffs”) and Defendant Clark County School District (“CCSD”), through their undersigned counsel, hereby stipulate and agree as follows:

1. The parties have met and conferred in good faith regarding certain discovery disputes and Plaintiffs’ desire to amend the complaint. As a result of the same, the parties have reached an agreement regarding the deposition testimony of Dr. Michelle McGuire and the filing of an amended complaint as outlined herein;

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1           2.       The parties agree that the Plaintiffs will file the proposed Amended Complaint  
2 attached hereto as **Exhibit 1**, within three judicial days from the date of the Court's order approving  
3 this stipulation;

4           3.       Defendant does not waive any rights to challenge the allegations in the Amended  
5 Complaint and CCSD will file an answer to the Amended Complaint within 14 days of Plaintiffs'  
6 filing of the same;

7           4.       Plaintiffs will not seek additional discovery related to the Amended Complaint  
8 beyond the discovery requests already served by Plaintiffs upon the Defendant;

9           5.       Defendant agrees that the following portions of Dr. McGuire's May 13, 2025  
10 deposition transcript are stricken: page 67, line 16 through page 72, line 11; and page 75, line 17  
11 through page 76, line 18;

12          6.       There are no further limitations and/or restrictions on the use of Dr. McGuire's  
13 deposition testimony, however, Plaintiffs reserve the right to make evidentiary objections at trial  
14 and/or in motion papers regarding the use of the remaining portions of Dr. McGuire's deposition in  
15 accordance with the Federal Rules of Civil Procedure or the Federal Rules of Evidence;

16          7.       Plaintiffs agree to not file a motion for sanctions or take any additional action related  
17 to Plaintiffs' perceived concerns regarding the questions asked during Dr. McGuire's deposition.

18          8.       Defendant agrees that going forward, if the deposition testimony concerning the  
19 conversations between William Anderson and his father Jeremy Anderson is referenced, Defendant  
20 will refer to the specific deposition testimony; and

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9. Plaintiffs agree that Defendant can ask hypothetical questions to any witness and can question witnesses regarding potential causes of William Anderson's alleged distress following the subject incident. Plaintiffs can object to any such questions consistent with the Federal Rules of Civil Procedure, Federal Rules of Evidence and case law interpreting the same.

**IT IS SO STIPULATED.**

DATED this 5th day of June 2025.

DATED this 5th day of June 2025.

**WOLF, RIFKIND, SHAPIRO,  
SCHULMAN & RABKIN, LLP**

**GREENBERG TRAURIG, LLP**

/s/ Douglas Cohen, Esq.

/s/ Kara B. Hendricks, Esq.

DOUGLAS COHEN,  
Nevada Bar No. 01214  
3773 Howard Hughes Parkway  
Suite 590 South  
Las Vegas, Nevada  
89169

MARK E. FERRARIO  
Nevada Bar No. 01625  
KARA B. HENDRICKS  
Nevada Bar No. 07743  
WHITNEY WELCH-KIRMSE  
Nevada Bar No. 12129  
10845 Griffith Peak Drive, Suite 600  
Las Vegas, Nevada 89135

*Counsel for Plaintiffs*

*Counsel for Defendant,  
Clark County School District*

**ORDER**

In consideration of the stipulation by the parties, and with good cause appearing,

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE  
DATED: June 5, 2025